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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

CASSANDRA MORSS,

Plaintiff,

v.

ONE TIME BINARY, INC., and SARAH
ASHLEY NORRIS a/k/a "JANE DOE 1,"

Defendants.

Civil Action No. 2:2023-cv-00151

MOTION FOR CLERK'S DEFAULT

COMES NOW Plaintiff Cassandra Morss, by and through counsel, and hereby gives notice that Defendants One Time Binary, Inc. and Sarah Ashley Norris a/k/a Jane Doe 1 have failed to plead or otherwise defend the Complaint within the time allowed under the Federal Rules of Civil Procedure. Plaintiff further states and alleges:

1. Plaintiffs filed a Complaint in this action on August 25, 2023. ECF 1.
2. Unable to serve Defendants via traditional means, Plaintiffs moved to serve Defendants by alternative means on October 30, 2023. ECF 8.
3. On October 31, 2023, the Court granted Plaintiffs' Motion for Alternative Service. ECF 9.

4. Pursuant to the October 31 Order, Plaintiffs served the Summons and Complaint upon Defendants (i) via e-mail correspondence to support@onetimebinary.com and help@onetimebinary.com on October 19, 2023; (ii) via Telegram at the username @Onetimebinarytrade_Support on November 22, 2023; and (iii) via transfer of Plaintiff's Non-Fungible Token (NFT) to Defendants' cryptocurrency wallet on January 11, 2024, which provided notice of this action and contained a hyperlink directing Defendants to Plaintiff's designated service website at <https://otbusalitigation.wixsite.com/http---www.onetimebi>. ECF 10.

5. The Court set Defendants' answer deadline for February 1, 2024.

6. Pursuant to FRCP 55(a), when the failure of a party to plead or otherwise defend is shown, the Clerk must enter the party's default.

7. Defendants have not answered or otherwise responded to the Complaint.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that the Clerk enter a default against Defendants One Time Binary, Inc. and Sarah Ashley Norris a/k/a Jane Doe 1.

Dated: February 19, 2024

Respectfully Submitted,

LAW OFFICES OF ROBERT V. CORNISH, JR., PC

/s/ Robert V. Cornish, Jr.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on February 21, 2024, I caused to be sent copies of the foregoing to Defendants One Time Binary, Inc. and Sarah Ashley Norris a/k/a Jane Doe 1 via Telegram messaging application and e-mail address at support@onetimebinary.com and help@onetimebinary.com.

/s/ Robert V. Cornish, Jr.